



October 7, 2019

VIA ECF

The Honorable Richard F. Boulware, II
 Lloyd D. George Federal Courthouse
 333 Las Vegas Blvd. South
 Las Vegas, NV 89101

Re: Notice of Exhibits from Phase 2 of the Evidentiary Hearing in *Le et al. v. Zuffa, LLC*, Case No. 2:15-cv-01045-RFB-BNW

Dear Judge Boulware:

Zuffa, LLC (“Zuffa”) and Plaintiffs (jointly, the “Parties”) have met and conferred regarding the exhibits to be admitted from the second phase of the evidentiary hearing, which included testimony from Professor Alan Manning, Professor Paul Oyer, and Joe Silva.

The Parties agree to admit the following exhibits, which are attached as Exhibits to this letter.

| Ex. # | Exhibit identifier | Description |
|--------------|--------------------|---|
| Pls. Ex. 17 | PCCX344 | ZFL-2677898 |
| Pls. Ex. 18 | JCCX8 | ZFL-0895314 |
| Pls. Ex. 19 | JCCX28 | ZUF-00296713 |
| Pls. Ex. 20 | PCCX104 | ZFL-0977248 |
| Pls. Ex. 21 | PCCX255 | ZFL-2207629 |
| Pls. Ex. 22 | PCCX338 | ZFL-2641098 |
| Pls. Ex. 23 | PCCX365 | ZUF-00085896 |
| Pls. Ex. 24 | PCCX391 | ZUF-00296703 |
| Zuffa Ex. 9 | PCCX685 | William M. Boal & Michael R. Ransom, <i>Monopsony in the Labor Market</i> , Journal of Economic Literature (1997) |
| Zuffa Ex. 10 | ZCCX279 | Expert Report of Edward E. Leamer, Ph.D., <i>In re High-Tech Employees Antitrust Litig.</i> , Case No. 5:11-cv-02509-LHK, ECF No. 967, dated Oct. 1, 2012 |
| Zuffa Ex. 11 | ZCCX214 | Exhibit 92 to Zuffa’s Opposition to Plaintiffs’ Motion for Class Certification – Forms of UFC Compensation |
| Zuffa Ex. 12 | ZCCX14 | Group of Bates Numbered Documents: ZFL-0456766; ZFL-0456767; ZFL-0460295; ZFL-0818970; ZFL-0822937; ZFL-0823267; ZFL-0876450; ZFL-2534954 |
| Zuffa Ex. 13 | JCCX22 | Email from T. Long to M. Mersch, Subj: RE: Mats Nilsson (inured???) vs Omari Akhmedov |



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|--------------|--------|---|
| Zuffa Ex. 14 | ZCCX17 | Group of Bates Numbered Documents: ZFL-0819765; ZFL-0822479 |
| Joint Ex. 1 | JCCX33 | Alan Manning, <i>Monopsony in Motion</i> (Princeton University Press, 2003) ¹ |

Respectfully yours,

/s/ Stacey K. Grigsby and /s/ Eric L. Cramer

Stacey K. Grigsby & Eric L. Cramer
Attorney for Defendant Zuffa, LLC and Plaintiffs

¹ The Parties disagree about the rationale for admitting the entirety of Professor Manning's Monopsony in Motion book, which is exhibit JCCX33 (Joint Exhibit 1). If the Court wishes to admit the entirety of Prof. Manning's book, Plaintiffs have no objection as it is by all accounts a leading book on monopsony by one of the world's great experts on the topic. See ECF No. 741, 9/12/19 Hrg. Tr. 5-162:17-24 (Zuffa's expert, Prof. Oyer, identifying Professor Manning and his book "as particularly authoritative on monopsony power"); see also *id.* at 164:12-165:8 (Prof. Oyer testifying that "if [he] really wanted to figure out if, in fact, a particular fighter's marginal revenue product impacted event revenue, [he] would try to get a couple of other labor economists to sit down with me and figure this out; [including] possibly Alan [Manning]"). Plaintiffs would note simply that the only portion of the book introduced at the hearing was an excerpt at pp. 30-31, ECF No. 745, 9/13/19 Hrg. Tr. 6-19:13-24:25, about which Prof. Manning testified, and thus admitting the entire book would not be justified under the ordinary approach of the Parties and the Court to exhibits from the hearing. Zuffa believes that the entire book should be admitted because Professor Oyer testified about the entirety of the book, including: what dependent variable was used in all of the regressions considering compensation as a dependent variable (wage level or equivalent, not wage share), ECF No. 741, 9/12/19 Hrg. Tr. 5-96:10-19; whether Professor Manning ever wrote that he wished he had wage share information (never), *id.* at 5-132:25-133:7; and whether any sports articles cited in this litigation were ever cited in his book (never), *id.* at 5-101:1-7.



Hon. Richard F. Boulware, II

October 7, 2019

Page 3 of 4

ATTESTATION OF FILER

The signatories to this document are myself and Eric Cramer, and I have obtained Mr. Cramer's concurrence to file this document on his behalf.

Dated: October 7, 2019

/s/ Stacey K. Grigsby
Stacey K. Grigsby



Hon. Richard F. Boulware, II

October 7, 2019

Page 4 of 4

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Notice of Exhibits from Phase 2 of the Evidentiary Hearing was served on October 7, 2019 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Roderick Crawford

Roderick Crawford
